

IN THE DISTRICT COURT OF THE UNITED STATES  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISON

UNITED STATES OF AMERICA, )  
                                 )    Criminal No.: 2:19-cr-00441-DCN  
vs.                          )  
                                )  
AMIR GOLESTAN,            )  
MICFO, LLC                )  
                                )  
Defendants.                )  
                                )

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**DEFENDANTS' RESPONSE TO THE UNITED STATES' MOTION FOR  
RECIPROCAL DISCOVERY**

The Defendants, Amir Golestan and Micfo, LLC, by and through their undersigned attorneys, hereby respectfully respond to the United States' July 2, 2019 Motion for Reciprocal Discovery [Entry Number 26] as follows:

- A. At this time, Defendants are not in possession of any prior statements given by witnesses, other than the Defendant himself, whom Defendants expect to call at trial. Defendants reserve the right to supplement this response and will produce any such statements that are subsequently identified in accordance with the requirements of Federal Rule of Criminal Procedure 26.2.
- B. Pursuant to Federal Rule of Criminal Procedure 16(b)(1)(A), Defendants produce herewith all books, papers, documents photographs, tangible objects, or copies of portions thereof, in their possession, custody, or control which Defendants intend to introduce as evidence in chief that are not already in the possession, custody, or control of the United States. Defendants reserve the right to supplement this response prior to trial should such additional items be identified.

C. Pursuant to Federal Rule of Criminal Procedure 16(b)(1)(B) and the United States request, Defendants produce herewith all results or “reports of . . . scientific tests or experiments made in connection with the particular case” that the Defendants intend to use in the Defendants’ case in chief at trial, or such reports as were prepared by a witness Defendants intend to call and which relate to the witness’s testimony, that are within Defendants’ possession, custody or control and are not already in the possession, custody, or control of the United States. Defendants reserve the right to supplement this response prior to trial should such additional reports be identified.

D. Defendants’ do not intend to offer a defense of alibi and therefore have no information or documents responsive to this request.

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July 12, 2019

Charleston, South Carolina